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E-FILED - 7/16/08

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Mohan Gil, Rodney Carr, Tony
Daniel, and Jermaine Wright,
individually, on behalf of others
similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

Solectron Corporation, Flextronics
International, USA, Inc., and DOES
1-10 inclusive,

Defendants.

Case No. C 07-06414 RMW (HRL)

**JOINT STIPULATION AND
~~proposed~~ ORDER GRANTING
LEAVE FOR PLAINTIFFS TO FILE
AN AMENDED COMPLAINT AND
ESTABLISHING A BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION FOR CONDITIONAL
CLASS CERTIFICATION**

Honorable Ronald M. Whyte
Complaint Filed: December 19, 2007

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Attorneys for DEFENDANTS

1 Plaintiffs MOHAN GIL, RODNEY CARR, TONY DANIEL, and
2 JERMAINE WRIGHT, individually, on behalf of others similarly situated, and on
3 behalf of the general public ("Plaintiffs") and Defendants SOLECTRON
4 CORPORATION and FLEXTRONICS INTERNATIONAL, USA, INC. (referred
5 to herein collectively as "Defendants"), by and through their respective counsel of
6 record, and pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, hereby
7 stipulate and agree as follows:
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11 WHEREAS, Plaintiffs seek to amend their Complaint to add an additional
12 Defendant, Aerotek, Inc.;

13 WHEREAS, the addition of this new Defendant will impact the scheduling
14 order entered by the Court in this matter on May 14, 2008 (Dkt. 48); and

15 WHEREAS, the Parties seek to enlarge the briefing schedule for Plaintiffs'
16 Motion for Class Certification from that which is provided in the current scheduling
17 order;
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19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that
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21 1) Defendants grant their consent to Plaintiffs to file their First Amended
22 Complaint, attached hereto as Exhibit A.

23 2) Plaintiffs' Motion for Class Certification shall be filed and served no
24 later than September 15, 2008.

25 3) The Parties request a case management conference with the Court
26 regarding the remaining dates in the current pretrial schedule, once the new
27 Defendant, Aerotek, Inc., has answered the Amended Complaint.
28

1 Dated: July 2, 2008

NICHOLS KASTER & ANDERSON, PLLP

2 By: 

3 Jessica J. Clay, MN # 318772

4 ATTORNEYS FOR PLAINTIFFS
5 AND THE PUTATIVE CLASSES
6

7 Dated: June 30, 2008

LITTLER MENDELSON
A Professional Corporation

8 By: 

9 Robert J. Wilger

10 ATTORNEYS FOR DEFENDANTS
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17 **ORDER**

18 Having read the foregoing Stipulation of the parties, and good cause
19 appearing therefore, **IT IS SO ORDERED.**

20 Dated: 7/16/08



21 Hon. Ronald M. Whyte
22 United States District Court Judge
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